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10 [Additional defendants and counsel
listed on signature pages]

11 UNITED STATES DISTRICT COURT
12 FOR THE NORTHERN DISTRICT OF CALIFORNIA
13 (SAN FRANCISCO DIVISION)
14

15 IN RE TFT-LCD (FLAT PANEL)
16 ANTITRUST LITIGATION

Case No. 3:07-md-1827 SI; MDL 1827
Individual Case No. 3:10-cv-0117 SI

17 This Document Relates To Individual Case No.:
18 3:10-cv-0117 SI

19 ELECTROGRAPH SYSTEMS, INC.;
ELECTROGRAPH TECHNOLOGIES, CORP.

20 Plaintiffs,

21 v.

22 EPSON IMAGING DEVICES CORPORATION,
23 et al.

24 Defendants.

**STIPULATION AND ~~[PROPOSED]~~
ORDER REGARDING DEADLINES
FOR DEPOSITIONS**

Honorable Susan Illston

25 Plaintiffs Electrograph Systems, Inc. and Electrograph Technologies, Corp. (collectively,
26 “Electrograph”) and Defendants Hitachi, Ltd., Hitachi Electronic Devices (USA), Inc., Hitachi
27 Displays, Ltd. (n/k/a Japan Display East, Inc.), Epson Imaging Devices Corporation, Epson
28

1 Electronics America, Inc., Sharp Corporation, Sharp Electronics Corporation, Toshiba
2 Corporation, Toshiba America Electronic Components, Inc., Toshiba America Information
3 Systems, Inc., Toshiba Mobile Display Co., Ltd., LG Display Co., Ltd., LG Display America,
4 Inc., AU Optronics Corporation, AU Optronics Corporation America, Mitsui & Co. (Taiwan),
5 Ltd., and HannStar Display Corporation (collectively, “Stipulating Defendants”), hereby stipulate
6 as follows:

7 **STIPULATION**

8 WHEREAS, fact discovery was set to close in this case on December 8, 2011, pursuant to
9 the Stipulation and Order Modifying Pretrial Schedule for “Track One” Direct Action Plaintiff
10 and State Attorney General Actions (Dkt. No. 3110, the “Scheduling Order”);

11 WHEREAS, on February 17, 2012, the Court entered an order approving a stipulation
12 extending the time for Stipulating Defendants to take the depositions of former Electrograph
13 employees until March 30, 2012 (Dkt. No. 4835);

14 WHEREAS, on March 5, 2012, the Court entered an order approving a stipulation
15 extending the time for Stipulating Defendants to take the depositions of former Electrograph
16 employees until April 30, 2012 (Dkt. No. 5025);

17 WHEREAS, on April 24, 2012, the Court entered an order approving a stipulation
18 extending the time for Stipulating Defendants to take the depositions of former Electrograph
19 employees until May 14, 2012 (Dkt. No. 5512);

20 WHEREAS former Electrograph employees Rabih (Robbie) Chikhani and Mohammed
21 (Mike) El-Ahmar are unavailable for depositions prior to May 14, 2012;

22 WHEREAS Stipulating Defendants would benefit from additional time to conduct the
23 depositions of former Electrograph employees Rabih (Robbie) Chikhani and Mohammed (Mike)
24 El-Ahmar;

25 WHEREAS Electrograph and Stipulating Defendants agree to the extension of the close
26 of fact discovery set forth in the Scheduling Order for the limited purpose of providing sufficient
27 time for Stipulating Defendants to take the depositions of former Electrograph employees Rabih
28 (Robbie) Chikhani and Mohammed (Mike) El-Ahmar;

1 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and among the
2 undersigned counsel, on behalf of their respective clients, Electrograph, on the one hand, and
3 Stipulating Defendants on the other hand, that the deadline for Stipulating Defendants to take the
4 depositions of former Electrograph employees is extended to June 11, 2012.

5 Dated: May 14, 2012

6 By: /s/ Kent M. Roger

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1 **FILER'S ATTESTATION**

2 I, Kent M. Roger, am the ECF user whose identification and password are being used to
3 file this Stipulation and [Proposed] Order. In compliance with General Order 45.X.B, I hereby
4 attest that Kevin McCann, Christopher Nedeau, Melvin Goldman, Hugh Bangasser, John
5 Grenfell, John Chung, Paul Eyre and Philip Iovieno concur in this filing.

6 /s/ Kent M. Roger

7 Kent M. Roger


8 *Attorneys for Defendants Hitachi, Ltd., Hitachi*
9 *Displays, Ltd., and Hitachi Electronic Devices*
10 *(USA), Inc.*

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[PROPOSED] ORDER

Pursuant to the parties' stipulation set forth above and pursuant to Rule 6-1(a) of the Civil
Local Rules, IT IS SO ORDERED.

Dated: May 16, 2012

By 

HON. SUSAN ILLSTON
UNITED STATES DISTRICT JUDGE